

Attachment 1
Corrections to ConocoPhillips San Francisco Refinery (Plant A016)
Draft Title V Permit

Comment Number	Source	Section	Table Number	Applicable Requirement	Proposed Change	Rationale
1					Change	Correct headers from "Phillips 66 Company" to "ConocoPhillips Company" (Section VII headers are correct)
2		VI	Permit Conditions	PC 20786	Delete	PC 476 & 1694 refer to Permit Condition 20786, which does not exist in the Title V permit.
3		VII	All Sources	40 CFR 61.342 (a)(2)	Delete	Table erroneously cites 61.342(a)(2) with the following limit "VOC concentration shall not exceed 500 ppmv above background".
4		VIII	Test Methods	SIP 8-5	Delete	Since BAAQMD 8-5 is SIP approved, these test methods no longer need to be included
5	S-3 (U-230, B-201)	VII	A.2	PC 1694	Change	Change PC 1694 Part A2b to Part A2c for correct citation for opacity monitoring
6	S-7 (U-231, B103)	VII	A.5	PC 1694	Change	Change PC 1694 Part A2b to Part A2c for correct citation for opacity monitoring
7	S-18 (U-244, B-504)	IV	A.16	PC 1694 Part A.1	Add	Federal enforceable column should be marked "N"
8	S-20 (U-244, B-506)	VII	A.18	9-10-301	Change	Change source test from semi-annual to annual. Source is < 25 mmBTU and is considered a small heater under the BAAQMD NOx policy memo to Refinery engineers from Bill De Boisblanc dated 4/10/03
9	S-21 (U-244, B-507)	IV	A.19	PC 1694 Part A.1	Add	Federal enforceable column should be marked "N"

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10	S-31 (U-200, B-501)	VII	A.23	9-10-301	Change	Change source test from semi-annual to annual. Source is < 25 mmBTU and is considered a small heater under the BAAQMD NOx policy memo to Refinery engineers from Bill De Boisblanc dated 4/10/03
11	S-43 (U-200, B-202)	IV	A.24	40 CFR 60	Delete	Delete NSPS 40 CFR 60 Appendix B Performance Specifications 3 & 5. Performance Spec 3 is for an SO2 monitor; we are monitoring H2S in fuel gas (Performance Spec 7 applies). Performance Spec 5 is for reduced sulfur and O2 monitoring of Claus sulfur recovery plants and does not apply to this source.
12	S-44 (U-200, B-201)	IV	A.25	40 CFR 60	Delete	Delete NSPS 40 CFR 60 Appendix B Performance Specifications 3 & 5. Performance Spec 3 is for an SO2 monitor; we are monitoring H2S in fuel gas (Performance Spec 7 applies). Performance Spec 5 is for reduced sulfur and O2 monitoring of Claus sulfur recovery plants and does not apply to this source.
13	S-91 (T-73)	II	C	2-1-123.3.6	Add	This source is missing from the exempt source list.
14	S-94 (T-78)	II	C	2-1-123.3.10	Add	This source is missing from the exempt source list.
15	S-101 (T-104), S-102 (T-105) S-106 (T-130)	VII	B8	Throughput	Change	Change units from bbl to gals to match the Throughput limit table in Section VI.
16	S-130 (T-188)	II	C	2-1-123.3.6	Add	This source is missing from the exempt source list.

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17	S-131 (T-189)	II	C	2-1-123.3.6	Add	This source is missing from the exempt source list.
18	S-132 (T-191)	II	C	2-1-123.3.4	Add	This source is missing from the exempt source list.
19	S-135 (T-200)	II	C	2-1-123.3.2	Add	This source is missing from the exempt source list.
20	S-136 (T-201)	II	C	2-1-123.3.2	Add	This source is missing from the exempt source list.
21	S-141 (T-213)	II	C	2-1-123.3.6	Add	This source is missing from the exempt source list.
22	S-142 (T-214)	II	C	2-1-123.3.6	Add	This source is missing from the exempt source list.
23	S-143 (T-215)	II	C	2-1-123.3.6	Add	This source is missing from the exempt source list.
24	S-144 (T-216)	II	C	2-1-123.3.6	Add	This source is missing from the exempt source list.
25	S-145 (T-217)	II	C	2-1-123.3.4	Add	This source is missing from the exempt source list.
26	S-148 (T-231)	II	C	2-1-123.3.2 2-1-123.3.9	Add	This source is missing from the exempt source list.
27	S-157 (T-252)	II	C	2-1-123.3.6	Add	This source is missing from the exempt source list.
28	S-162 (T-262)	II	C	2-1-123.3.6	Add	This source is missing from the exempt source list.
29	S-167 (T-268)	II	C	2-1-123.3.6	Add	This source is missing from the exempt source list.
30	S-188 (T-300)	II	C	2-1-123.3.1	Add	This source is missing from the exempt source list.
31	S-202 (T-521)	II	C	2-1-123.3.6	Add	This source is missing from the exempt source list.

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32	S-204 (T-528)	II	C	2-1-123.3.2	Add	This source is missing from the exempt source list.
33	S-206 (T-530)	II	C	2-1-123.3.4	Add	This source is missing from the exempt source list.
34	S-207 (T-531)	II	C	2-1-123.3.6	Add	This source is missing from the exempt source list.
35	S-224 (T-746)	II	C	2-1-123.3.4	Add	This source is missing from the exempt source list.
36	S-225 (T-747)	II	C	2-1-123.3.4	Add	This source is missing from the exempt source list.
37	S-226 (T-748)	II	C	2-1-123.3.6	Add	This source is missing from the exempt source list.
38	S-227 (T-749)	II	C	2-1-123.3.6	Add	This source is missing from the exempt source list.
39	S-228 (T-750)	II	C	2-1-123.3.6	Add	This source is missing from the exempt source list.
40	S-229 (T-751)	II	C	2-1-123.3.6	Add	This source is missing from the exempt source list.
41	S-230 (T-752)	II	C	2-1-123.3.6	Add	This source is missing from the exempt source list.
42	S-231 (T-753)	II	C	2-1-123.3.4	Add	This source is missing from the exempt source list.
43	S-237 (T-771)	II	C	2-1-123.3.4	Add	This source is missing from the exempt source list.
44	S-239 (Tank 212)	VII	B4	Throughput	Change	Change throughput limit on S-239 from 8.76E^5 to 8.76E^6 to match the Throughput limit table in Section VI.
45	S-240 (T-774)	II	C	2-1-123.3.4	Add	This source is missing from the exempt source list.
46	S-241 (T-775)	II	C	2-1-123.3.4	Add	This source is missing from the exempt source list.

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47	S-266 (T-1345)	II	C	2-1-123.3.4	Add	This source is missing from the exempt source list.
48	S-267 (T-1346)	II	C	2-1-123.3.4	Add	This source is missing from the exempt source list.
49	S-293 (Tank F805)	IV	B21		Clarify	The heading to Table IV-B21 has a typo for S-293. The common name for this source is F805. Tanks 115 through Tanks 773 in the heading are not part of S-293. Note: none of tanks 115 to 773 listed have source numbers.
50	S-294			PC 18680	Add	The Facility Permit to Operate (expires August 1, 2004) contains permit condition 18680. This requirement is not included in the Title V permit.
51	S-296 & (Main Flare)	IV	L	40 CFR 60 Subpart J	Delete	S-296 (Main Flare) is not subject 40 CFR 60 Subpart J as no construction or modification occurred after 6/11/73.
52	S-296 & (Main Flare)	VI	Permit Conditions	PC 18255	Delete	Permit conditions part 2 and 3 are for NSPS Subpart J flares – S-296 is not subject to NSPS Subpart J.
53	S-300 (Coker)	VI	Permit Conditions	PC 476	Change	Change from submitting report to keeping records on-site. PC 476 C2 requires that a monthly operational report be sent to the APCO with daily charging rate for all feed streams. This information can be retained on-site for APCO access for 5 years which is consistent with other recordkeeping requirements in the Title V permit.
54	S-301 (U-234 pit)	II	A	Throughput	Change	Units should be in long tons/hour as sulfur production is always reported in long tons. This is consistent with S-1001. See Attachment 2 for throughput limit comments.

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55	S-301 (U-234 pit)	VI	Throughput Limits	Throughput	Change	Units should be in long tons/hour as sulfur production is always reported in long tons. This is consistent with S-1001. See Attachment 2 for throughput limit comments.
56	S-302 (U-236 pit)	II	A	Throughput	Change	Units should be in long tons/hour as sulfur production is always reported in long tons. This is consistent with S-1002. See Attachment 2 for throughput limit comments.
57	S-302 (U-236 pit)	VI	Throughput Limits	Throughput	Change	Units should be in long tons/hour as sulfur production is always reported in long tons. This is consistent with S-1002. See Attachment 2 for throughput limit comments
58	S-303 (U-238 pit)	II	A	Throughput	Change	Units should be in long tons/hour as sulfur production is always reported in long tons. This is consistent with S-1003. See Attachment 2 for throughput limit comments
59	S-303 (U-238 pit)	VI	Throughput Limits	Throughput	Change	Units should be in long tons/hour as sulfur production is always reported in long tons. This is consistent with S-1003. See Attachment 2 for throughput limit comments
60	S-306 (U-231)	VI	Throughput Limits	Throughput	Change	Change annual throughput from $5.66E^6$ to $7.67E^6$ bbls. This was discussed in e-mail from V. Uyeda to J. Elliot dated 6/19/03 agreed upon in meeting with Julian Elliot on 7/24. Also discussed in telephone conversation with J. Elliott on 8/28/03.
61	S-307 (U-240)	VI	Throughput Limits	Throughput	Change	Change annual throughput from $1.26E^7$ to $1.39E^7$ bbls. This was discussed in e-mail from V. Uyeda to J. Elliot dated 6/19/03 agreed upon in meeting with Julian Elliot on 7/24. Also discussed in telephone conversation with J. Elliott on 8/28/03.

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62	S-309 (U-248)	VI	Throughput Limits	Throughput	Change	Change annual limit from $6.1E^6$ to $6.11E^6$ to be consistent with daily limit 16740 bbls/day * 365. This was discussed in e-mail from V. Uyeda to J. Elliot dated 6/23/03 and telephone conversation on 8/28/03.
63	S-318 (U-76 blending)	IV	N	Throughput Limits	Change	For consistency with the Throughput Limits listed in Section VI, S-318 should be identified as a grandfathered source and the limits are not federally enforceable.
64	S-350 (U-267)	VI	Permit Conditions	PC 383	Change	Change from sampling on a daily basis to sampling each time crude is changed. PC 383 1b is a newly imposed monitoring condition under Title V. Crude feed to S-350 does not change daily.
65	S-351 (U-267, B601/ B602)	IV	A.30	40 CFR 60	Delete	Delete NSPS 40 CFR 60 Appendix B Performance Specifications 3 & 5. Performance Spec 3 is for an SO ₂ monitor; we are monitoring H ₂ S in fuel gas (Performance Spec 7 applies). Performance Spec 5 is for reduced sulfur and O ₂ monitoring of Claus sulfur recovery plants and does not apply to this source.
66	S-352 to S-357 (turbines /duct burners)	VI	Permit Conditions	PC 12122	Change	Change PC 12122 3, 4, & 5 to allow exemption for start-up and shutdowns. Currently each turbine duct/burner set must be abated by SCR at all times.
67	S-370 (U-228)	VI	Throughput Limits	Throughput	Change	Change annual throughput from $3.8E^6$ to $4.03E^6$ 460 bbls/hr * 8760 hrs/year = $4.03E^6$. S-370 was modified in BAAQMD application 12412.

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68	S-371 (U-228, B520)	IV	A.31	40 CFR 60	Delete	Delete NSPS 40 CFR 60 Appendix B Performance Specifications 3 & 5. Performance Spec 3 is for an SO ₂ monitor; we are monitoring H ₂ S in fuel gas (Performance Spec 7 applies). Performance Spec 5 is for reduced sulfur and O ₂ monitoring of Claus sulfur recovery plants and does not apply to this source.
69	S-372 (U-228, B-502)	IV	A.32	40 CFR 60	Delete	Delete NSPS 40 CFR 60 Appendix B Performance Specifications 3 & 5. Performance Spec 3 is for an SO ₂ monitor; we are monitoring H ₂ S in fuel gas (Performance Spec 7 applies). Performance Spec 5 is for reduced sulfur and O ₂ monitoring of Claus sulfur recovery plants and does not apply to this source.
70	S-376, S-377, S-378 (cold cleaners)	IV	R	8-16-303	Change	Corrected SIP applicability to BAAQMD rules. See Attachment 3 for changes.
71	S-380 (Carbon silo)	VII	W	Throughput	Change	Change throughput limit from 1440 to 2628 tons to match Throughput Limits Table in section VI.
72	S-386 (PAC)	VII	G	Throughput	Change	Change throughput limit from 1.6E ⁶ to 1.6E ⁷ to match Throughput Limits Table in section VI.
73	S-398 (MP-30 flare)	IV	L	40 CFR 60 Subpart J	Change	NSPS 40 CFR 60 Subpart J applies to S-398 only. Clarify the heading so that S-296 is excluded from this requirement.

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74	S-438 (U-110, H-1)	IV	A.33	40 CFR 60	Delete	Delete NSPS 40 CFR 60 Appendix B Performance Specifications 3 & 5. Performance Spec 3 is for an SO ₂ monitor; we are monitoring H ₂ S in fuel gas (Performance Spec 7 applies). Performance Spec 5 is for reduced sulfur and O ₂ monitoring of Claus sulfur recovery plants and does not apply to this source.
75	S-1001 (U-234)	VI	Throughput Limits	Throughput	Change	This source has been incorrectly categorized as having gone through the New Source Review (NSR) process and should be identified as a Grandfathered source. See Attachment 2 for throughput limit comments
76	S-1002 (U-235)	VI	Throughput Limits	Throughput	Change	This source has been incorrectly categorized as having gone through the New Source Review (NSR) process and should be identified as a Grandfathered source. See Attachment 2 for throughput limit comments
77	S-1003 (U-238)	VI	Throughput Limits	Throughput	Change	This source has been incorrectly categorized as having gone through the New Source Review (NSR) process and should be identified as a Grandfathered source. See Attachment 2 for throughput limit comments